

**UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT**

<b>SAMUEL KERSON,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO. 5:20-CV-00202-CR</b>
	)	
<b>VERMONT LAW SCHOOL, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF'S RESPONSE TO COURT'S  
REQUEST FOR ADDITIONAL INFORMATION**

Plaintiff Samuel Kerson is responding to the Court's order of February 4, 2021 requesting Plaintiff to file any "additional measures to protect his rights" under VARA.

Plaintiff has previously filed his motion for preliminary injunction and his reply to Defendant's opposition which sets forth his legal position under VARA with regard to Defendant's stated intention to erect a permanent wall entombing the murals. In view of Defendant's unyielding contention in response to the Court's order of February 4, 2021 that it intends to provide no access to the murals, there is little more that Plaintiff can submit other than what is contained in the motion for preliminary injunction.

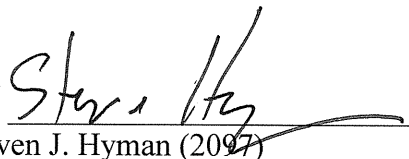
However, it should be noted that the murals are, in fact, presently covered by canvas drop cloths which allows very cumbersome and limited access to the murals since there is no mechanism to move the various drop cloths away from the murals. During the pendency of this litigation, Plaintiff is willing to accept the erection of an appropriate movable screen or curtain which would give viewers reasonable access to view the murals. Such a movable screen or draw curtain would allow Defendant to cover the murals but would also enable a student, visitor, or

other person to view the murals. This proposal would essentially maintain the *status quo* pending the Court's resolution of this action. Beyond such a temporary measure, Plaintiff, of course, continues to assert his rights under VARA.

Respectfully submitted,

THE PLAINTIFF

SAMUEL KERSON

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Dated: February 22, 2021